

21st Century Radio Ventures, Inc.  
530 Wilshire Boulevard, Suite 301  
Santa Monica, CA 90401  
Tel: (310) 393-2741  
Fax: (310) 393-4802

RECEIVED  
JUL 08 1996  
FCC MAIL ROOM

July 5, 1996

DOCKET FILE COPY ORIGINAL

Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

re: Littlefield, Wolfforth and Tahoka, Texas, MM Docket 95-83, RM 8634

Please find enclosed an original and four copies of Petitioner's "Supplemental Comments" in the above referenced proceeding, as requested by the Commission by its "Request For Supplemental Information" (released May 17, 1996).

Please return the copy marked "Stamp and Return" in the enclosed postage paid envelope.

Please contact the undersigned if you have any questions.

Very truly yours,

  
James L. Primm

cc: Reg Hopkinson

No. of Copies rec'd  
by ABC

0+4

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**RECEIVED**  
**JUL 08 1996**  
**FCC MAIL ROOM**

In the Matter of	)	
	)	
Amendment of Section 73.202(b)	)	MM Docket No. 95-83
Table of Allotments,	)	RM-8634
FM Broadcast Stations	)	
(Littlefield, Wolfforth and	)	
Tahoka, Texas)	)	

**SUPPLEMENTAL COMMENTS OF 21st CENTURY RADIO  
VENTURES, INC**

21st Century Radio Ventures, Inc. ("Petitioner"), permittee of KAIQ(FM), Littlefield, Texas hereby respectfully submits these Supplemental Comments in the above-captioned Rule Making. In support hereof Petitioner hereby submits the following:

**I. INTRODUCTION**

Petitioner filed a Petition for Rule Making in the above captioned proceeding for the purpose of allotting Channel 238C3 at Wolfforth, Texas, to provide that community with its first local service, and deleting Channel 238C3 at Littlefield, Texas and deleting vacant allotment 237A at Tahoka, Texas. The Commission sent out a Notice of Proposed Rule Making in the above referenced proceeding. Petitioner filed timely comments during the comment period. Comments were also filed by Lee W. Shubert, Trustee, licensee of KLLL(FM), Lubbock ("KLLL"), and by Emil Macha. In addition, on August 24,

1995, Albert Benavides submitted an application for a construction permit for FM Channel 237A at Tahoka Texas. Petitioner now files these Supplemental Comments in response to the FCC's "Request for Supplemental Information" released May 17, 1996.

**II. The Predicted 70dBu signal for KAIQ at Wolfforth, TX Will Encompass Only 45.4% of the Lubbock Urbanized Area and therefore the Showing Required Under Headland, Alabama Is Not Required In This Case**

In Headland, Alabama and Chattahoochee, Florida, 10 FCC Rcd 10352 (1995), the Commission set forth its rules with respect to moves of stations to areas which are proximate to, but not within, urbanized areas. In Headland, Alabama, the Commission held that "we will henceforth require station seeking to move from rural communities to suburban communities located outside but proximate to Urbanized Areas to make the same showing we currently require of stations seeking to move into Urbanized Areas if they would place a city-grade (70 dBu) signal over 50% or more of the Urbanized Area" 10 FCC Rcd at 10354 (emphasis added). As a result, stations that do not place a 70 dBu signal over at least 50% of the urbanized area are not required to make the Headland, Alabama showing.

As shown in the attached engineering statement of duTreil, Lundin & Rackley (see Exhibit 1) the 70 dBu contour of KAIQ FM, based on maximum Class C3 facilities and assuming uniform terrain in all directions, will reach only 45.4% of the Lubbock Urbanized Area. KAIQ should therefore not be subject to the requirements of Headland, Alabama and a showing of the factors of Faye &

Richard Tuck should not be mandated in this case.

Although not required under the ruling in Headland, Alabama, Petitioner is pleased to provide evidence of the independence of Wolfforth from Lubbock as requested by the Commission in this proceeding. Summarized below are our findings in this case.

**III. Wolfforth is Deserving of a First Local Service Preference Using the Commission's Three Factors Enumerated in RKO General and Faye and Richard Tuck.**

The Commission has requested that Petitioner submit evidence sufficient to show that Wolfforth is deserving of a first local service preference using the Commission's three factors enumerated in RKO General, Inc., 5FCC Rcd 3222 (1990) and Faye and Richard Tuck, 3FCC Rcd 5374 (1988). In RKO and Faye and Richard Tuck the Commission clarified the type of evidence to consider in determining whether a proposal to serve a suburban community should be considered as a first local service or whether the suburban community should be credited with all of the services licensed in the urbanized area. There are three primary criteria: First, signal population coverage is examined. This refers to the degree of coverage to which the station could provide service not only to the suburban community but to the adjacent metropolis as well. Second, the size of the suburban community is compared to the size of the metropolis and whether

the suburban community is within or outside but proximate to the Urbanized Area of the central city. Third, the Commission reviews eight factors to determine the degree of interdependence between the two communities. Headland Alabama, 10 FCC Rcd 10352, 10355 (1995); RKO, 5 FCC Rcd at 3223.

As demonstrated below, although Wolfforth is located near a larger community, it is a separate and independent community richly deserving its first local radio service. Indeed, public policy demands that towns such as Wolfforth be provided their own independent media outlets so that they can maintain their independence from larger neighbors for reliance on news, community events, local retail sales and emergency information in the event of manmade or natural disasters.

**A. Factor 1 -- Signal Population Coverage.**

As noted in the attached engineering statement, only 45.4% of the Lubbock Urbanized Area will be reached by the 70 dBu signal of KAIQ. This tends to indicate that the station will not primarily be serving the urbanized area, focusing instead upon Wolfforth.

**B. Factor 2 -- Size and Proximity of Wolfforth to Lubbock.**

Wolfforth is a sizeable rural community with 1,941 people (1990 census). Its present population is estimated to be 2,400. Lubbock contains approximately 186,206 people (1990 census). The incorporated City of Wolfforth is located approximately eight kilometers outside of the city limits of Lubbock, separated by open rural area and farm land. Wolfforth is also located

outside of the urbanized area by approximately eight kilometers.

### **C. Factor 3 -- Interdependence of Wolfforth on Lubbock.**

As discussed below, Wolfforth is independent in virtually every way from Lubbock. Many residents both live and work in Wolfforth, whose phone book lists over one hundred individual businesses within the city itself. Fifty-nine of these Wolfforth businesses are registered with Dunn & Bradstreet. Wolfforth maintains its own elected mayor and city council. It has its own city financed police department and a fifteen-member volunteer fire department. The city provides water and sewer services to the residents of Wolfforth. A new municipal building has recently been completed, which houses the city administrative offices, the police department and city library. There are five churches located within Wolfforth.

#### **1. Many Residents of Wolfforth Both Live and Work in the Community**

In discussions with local residents and the Wolfforth Chamber of Commerce Petitioner determined that there are over 100 businesses, both large and small, located in Wolfforth most all of which employ local residents. As a result, it appears that many residents of Wolfforth both live and work in the community.

#### **2. Local Media in Wolfforth**

There is very little local media in this sizable town, indicating the need for a local radio station to provide local news and community event information. In

addition, severe weather is not uncommon in the area and a media outlet is needed to provide up-to-the-minute emergency information for Wolfforth.

### **3. Community Leaders View Wolfforth as Independent From Lubbock**

The attached letter from Mayor Rick McWhorter to the Federal Communications Commission (Exhibit 2) indicates the strong feeling that people in Wolfforth have for their community. Mayor McWhorter states unequivocally that "In my opinion, which I believe is shared by both Wolfforth and Lubbock residents, Wolfforth is a separate community, independent in virtually every way from Lubbock."

### **4. Wolfforth Has Its Own Local Government and Elected Officials.**

Wolfforth has its own local government which is completely separate and apart from Lubbock. A list of local elected officials is attached as Exhibit 3. The Wolfforth City Council consists of five members. The officials are elected at large. The mayor appoints a City Administrator.

### **5. Wolfforth Has Its Own Zip Code and Has Its Own Section in the GTE Phone Book That Does Not Include a Lubbock Section.**

Wolfforth has been assigned its own zip code which is 79382. This zip code is not shared by any portion of Lubbock. Wolfforth also has its own Post Office, which, according to the Wolfforth Community Fact Sheet, has "Recently moved into a large new building featuring the most modern concepts in postal facilities."

The telephone directory serves as further evidence of Wolfforth's independence from Lubbock. Wolfforth is serviced by GTE. The telephone directory includes a separate section for Wolfforth. While including separate sections on several other cities, the directory in which Wolfforth is located does not even include a section for Lubbock. A copy of the telephone directory cover and Wolfforth section of the directory is attached as Exhibit 4.

#### **6. Wolfforth Has Many Active Commercial Establishments**

Wolfforth has a thriving business community. A list provided by the Wolfforth Chamber of Commerce is attached as Exhibit 5. The telephone book reveals over one hundred businesses in Wolfforth. Exhibit 6 lists major employers, their product or service, and the number of employees. Wolfforth industries include the Frenship Independent School District, located in the heart of Wolfforth, employing 543 with an enrollment of 4,000 students, and the American Bank of Commerce with 128 employees, as well as a large retail grocery, a child care center, and farm equipment, meat packing, and welding businesses. This further supports the fact that Wolfforth is a growing, thriving community which does not need to rely on its larger neighbor for most services.

#### **7. Wolfforth Is A Separate Advertising Market**

Because of the dearth of advertising outlets available in Wolfforth, one of the only advertising vehicles is the phone directory. The GTE directory clearly separates the Wolfforth and Lubbock advertising markets, as evidenced by the fact that they are in separate telephone books.



## **8. Wolfforth Does Not Rely on Lubbock for Virtually Any Public Services; Wolfforth Has A Separate Taxing Authority**

Wolfforth has its own municipally funded police department with four full-time personnel. It has a volunteer fire department made up of 15 volunteers. As noted above, Wolfforth has its own independent school district with 4,000 students attending schools located in Wolfforth and 543 employees. A new city library has recently been completed.

The City of Wolfforth provides water and sewer services. Electricity, gas and telephone are supplied by major regional carriers.

A list of City Services provided by Wolfforth and their budgets is attached hereto as Exhibit 7.

The City of Wolfforth is near completion of a new City Park. Upon completion, the park will contain a 4-field baseball complex, a lake stocked for fishing, a walking and jogging path, sheltered picnic areas, 2 basketball courts, a sand volleyball court, and a playground area.

Wolfforth assesses local taxes which are collected by the County Appraisal District. These include a 0.58% City Tax, a 0.142% school tax, and a .0084% water tax. City tax categories include Inventory, Machinery-Equipment, and Retail Sales taxes.

### **D. Applying the Factors of RKO and Tuck Leads To The Conclusion That Petitioner's Request Should Be Considered A First Local Service.**

Wolfforth is clearly independent from Lubbock. As stated in Faye and Richard Tuck, the size and proximity of the specified community to the central

city and signal population coverage is pertinent, but has less significance than interdependence. 3 FCC Rcd at 5374; Headland, Alabama, 10 FCC Rcd at 10355. Applying the test as set out in Faye and Richard Tuck and subsequent cases, even though the city is somewhat physically close to Lubbock (the importance of which is diluted by the fact that only 45.5% of the Lubbock Urbanized Area will receive the 70dBu signal of KAIQ, Wolfforth is located outside the urbanized area, separated by farm land and open space and is approximately eight kilometers from the city limits at its closest point), the clear independence of Wolfforth from Lubbock can only lead to the conclusion that the instant proposal should be considered as a request for a first local service.

#### **IV. Petitioner Restates and Confirms That It Will Apply For and Build Channel 238C3 if Granted.**

Petitioner restates and reconfirms its intention to apply for Channel 238C3 if it is allotted and that it will promptly build the station should the allotment be granted.

#### **V. Conclusion.**

Because only 45.4% of the Lubbock Urbanized Area will receive the 70 dBu signal of KAIQ, Petitioner should not be required to make the showing set forth in Headland, Alabama, which would require that Petitioner apply the factors set forth in RKO and Faye and Richard Tuck. If, as requested by the Commission, we apply the factors in RKO and Faye and Richard Tuck, Wolfforth is clearly independent from Lubbock and the instant request should be

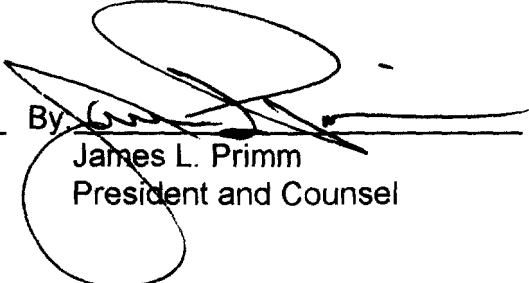
considered a request for a first local service.

The statements in these Supplemental Reply Comments are true,  
complete and correct to the best of my knowledge and belief and are made in  
good faith.

Respectfully submitted,

21st Century Radio Ventures, Inc.

Dated: July 5, 1996

By:   
James L. Primm  
President and Counsel

21st Century Radio Ventures, Inc.  
530 Wilshire Blvd., Suite 301  
Santa Monica, CA 90401  
310-393-2741

**EXHIBIT 1**

**ENGINEERING STATEMENT OF  
DUTREIL, LUNDIN & RACKLEY**

TECHNICAL STATEMENT  
IN SUPPORT OF THE COMMENTS OF  
21ST CENTURY RADIO VENTURES, INC.  
IN MM DOCKET NO. 95-83

This technical narrative was prepared on behalf of 21st Century Radio Ventures, Inc. ("Petitioner") in support of Comments in MM Docket No. 95-83<sup>1</sup>. MM Docket No. 95-83 was issued in response to a request by the Petitioner which proposed the reallocation of KAIQ(FM), channel 238C3 from Littlefield to Wolfforth, Texas and the modification of its construction permit accordingly.<sup>2</sup> The purpose of this technical narrative is to demonstrate that the 70 dBu contour of the reallocated channel 238C3 operation will encompass 45.4% of the Lubbock Urbanized Area.

Figure 1 is a map developed using the 1990 U.S. Census Topologically Integrated Geographic Encoding and Referencing TIGER/Line™ files which depicts the 70 dBu contour for the proposed KAIQ channel 238C3 operation set forth in the Petition.<sup>3</sup> The location of the 70 dBu contour is based on maximum Class C3 facilities (ERP 25 kW/HAAT 100 m) and it is presumed that the terrain is uniform in all directions. The city limits of Lubbock,

---

<sup>1</sup> RM-8634, adopted May 8, 1996, released May 17, 1996.

<sup>2</sup> Petitioner also proposed either the deletion or substitution of the vacant channel 237A allotment at Tahoka, Texas.

<sup>3</sup> TIGER/Line™ files are geographic coordinate-based digital maps of the entire United States which permit extraction of 1990 census data for selected areas.

based on the 1990 U.S. Census, have been shaded for reference purposes.

Figure 2 is a copy of the Urbanized Area map for Lubbock obtained from Appendix G of the report "1990 Census of Population and Housing, Population and Housing Units Counts, Texas, 1990 CPH-2-45". The proposed KAIQ(FM) 70 dBu contour depicted on Figure 1 was transferred to Figure 2.

Figure 3 is copy from Table 23 (Population, Housing Units, and Land Area for Urbanized Areas) of the same Census report which provides a breakdown of the component parts of the Lubbock Urbanized Area. As shown on Figure 3, the Lubbock Urbanized Area contains a total of 281.8 square kilometers. The majority of the Lubbock Urbanized Area consists of all of the Lubbock city limits (269.9 square kilometers) along with additional small "urban fringe" areas (11.9 square kilometers). It has been determined that the proposed KAIQ(FM) 70 dBu contour encompasses 128.1 square kilometers within the Lubbock Urbanized Area, or 45.4% of the total area within the Lubbock Urbanized Area.<sup>4</sup>

---

<sup>4</sup> The area encompassed within the 70 dBu contour was determined by using mapping software which determines the intersection (or common area) between separate, overlapping regions of TIGER/Line data files.

The attached technical statement has been prepared by or under the direct supervision of W. Jeffrey Reynolds, technical consultant with the firm of du Treil, Lundin and Rackley, Inc., a telecommunications consulting firm located in Sarasota, Florida, who states that his qualifications are a matter of record with the Federal Communications Commission, having been presented on previous occasions. All data and statements contained herein are true and correct to the best of his knowledge and belief.



W. Jeffrey Reynolds

du Treil, Lundin & Rackley, Inc.  
240 North Washington Blvd.  
Suite 700  
Sarasota, Florida 34236  
(941) 366-2611

July 2, 1996

Figure 1

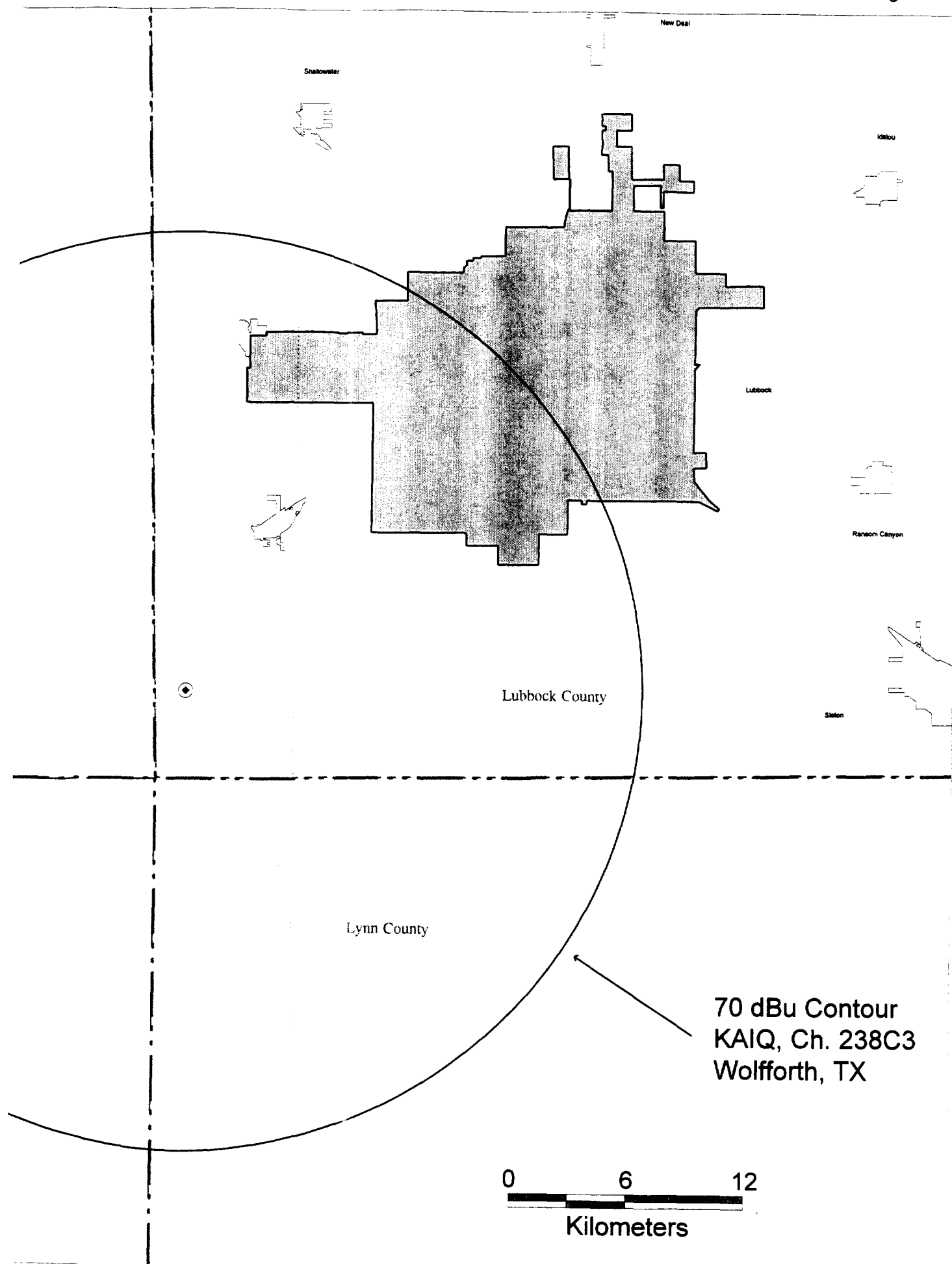
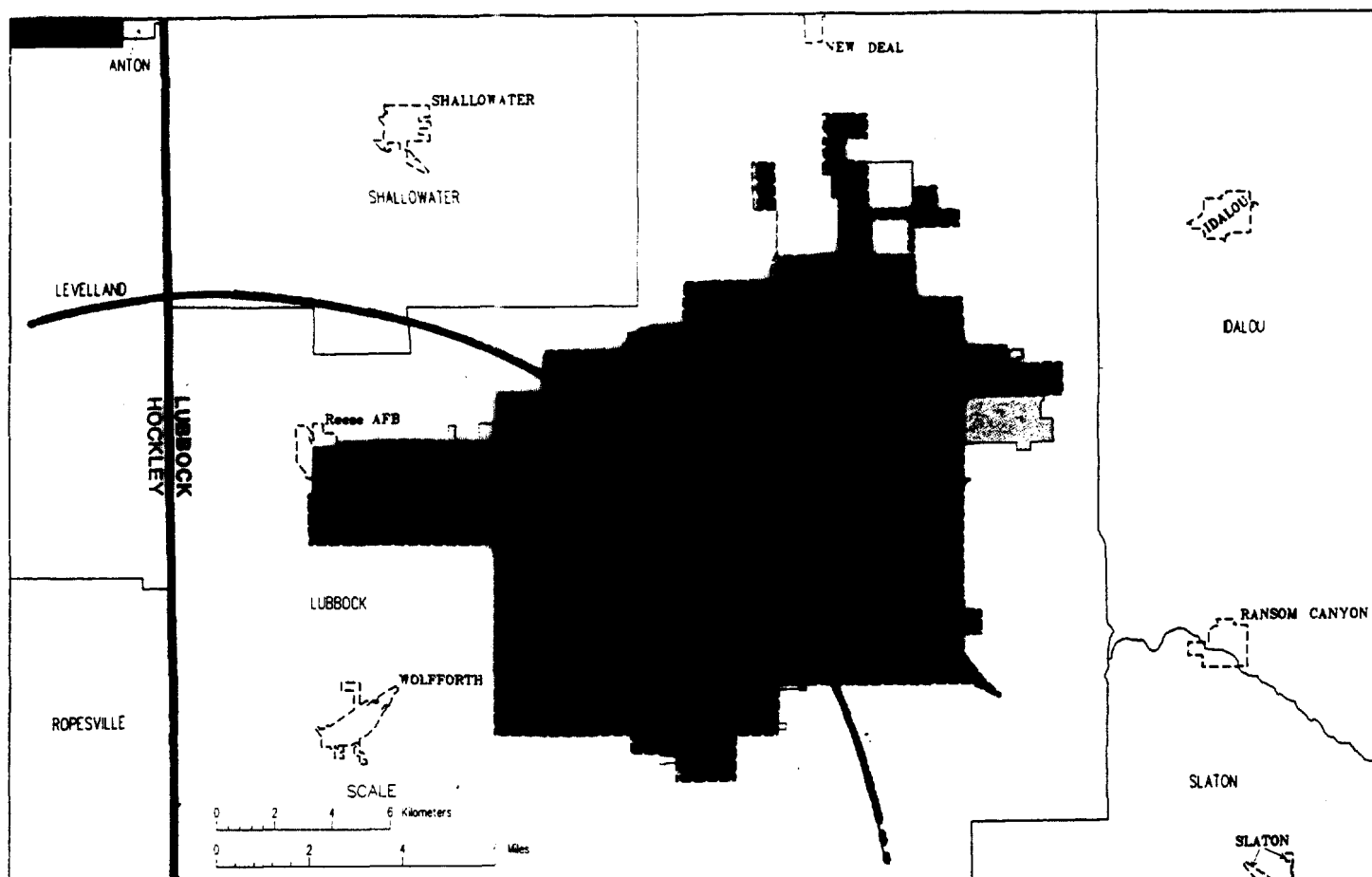




Figure 2

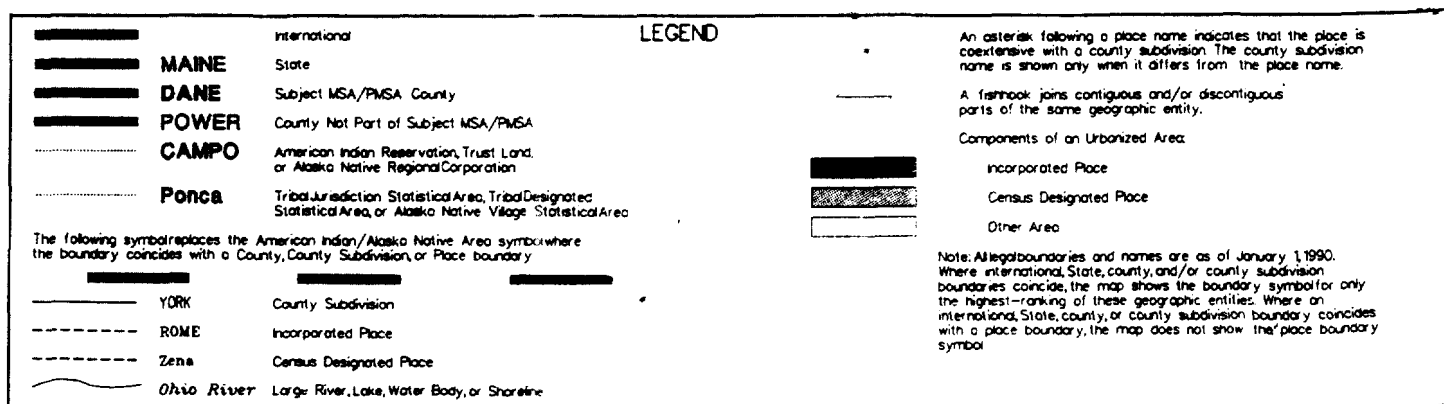
# Urbanized Areas



U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census

MAPS

TEXAS G-49



U.S. DEPARTMENT OF COMMERCE Economics and Statistics Administration Bureau of the Census

G-34 TEXAS

MAPS

Table 23. Population, Housing Units, and Land Area for Urbanized Area: 1990—Con.

(Density is computed using land area. For definitions of terms and meanings of symbols, see text.)

Urbanized Area			Area measurements				Density			
	Population	Housing units	Total area		Land area		Population per—		Housing units per—	
			Square kilometers	Square miles	Square kilometers	Square miles	Square kilometer	Square mile	Square kilometer	Square mile
<b>Lewisville, TX—Con.</b>										
Denton County (pt.)	78 878	30 704	183.6	70.9	178.8	69.0	441.2	1 143.2	171.7	445.0
Denton division (pt.)	-	-	-	-	-	-	-	-	-	-
Corinth town (pt.)	-	-	-	-	-	-	-	-	-	-
Justin-Romana division (pt.)	2 154	815	14.2	5.5	14.2	5.5	151.7	391.6	57.4	148.2
Double Oak town (pt.)	4	2	-	-	-	-	-	-	-	-
Flower Mound town (pt.)	2 150	813	14.1	5.5	14.1	5.5	152.5	390.9	57.7	147.8
Lewisville division (pt.)	76 724	29 889	169.4	65.4	164.6	63.6	466.1	1 206.4	181.6	470.0
Corinth town (pt.)	3 944	1 385	20.1	7.7	20.0	7.7	197.2	512.2	69.3	179.9
Double Oak town (pt.)	1 660	511	5.6	2.2	5.6	2.1	296.4	790.5	91.3	243.3
Flower Mound town (pt.)	13 377	4 553	68.9	26.6	68.8	26.6	194.4	502.9	66.2	171.2
Hickory Creek town	1 893	707	11.9	4.6	11.7	4.5	161.8	420.7	60.4	157.1
Highland Village city	7 027	2 352	12.8	4.9	10.8	4.2	650.6	1 673.1	217.8	560.0
Lake Dallas city	3 656	1 559	6.7	2.6	5.8	2.2	630.3	1 661.8	268.8	708.4
Lewisville city (pt.)	44 944	18 724	41.7	16.1	41.6	16.0	1 080.4	2 809.0	450.1	1 170.3
<b>Tarrant County (pt.)</b>	-	-	-	-	-	-	-	-	-	-
Northeast Tarrant division (pt.)	-	-	-	-	-	-	-	-	-	-
Flower Mound town (pt.)	-	-	-	-	-	-	-	-	-	-
<b>Longview, TX</b>										
The area	76 429	32 577	162.7	62.8	162.3	62.7	470.9	1 219.0	200.7	519.6
In central place	70 311	30 293	135.7	52.4	135.5	52.3	518.9	1 344.4	223.6	579.2
Longview city	70 311	30 293	135.7	52.4	135.5	52.3	518.9	1 344.4	223.6	579.2
Urban fringe	6 118	2 284	27.0	10.4	26.9	10.4	227.4	588.3	84.9	219.6
<b>Gregg County (pt.)</b>	74 773	31 904	155.1	59.9	154.7	59.7	483.3	1 252.5	206.2	534.4
Gladesville division (pt.)	1 638	628	10.1	3.9	10.1	3.9	162.2	420.0	62.2	161.0
White Oak city (pt.)	1 638	628	10.1	3.9	10.1	3.9	162.2	420.0	62.2	161.0
Longview division (pt.)	71 906	30 812	131.5	50.8	131.1	50.6	548.5	1 421.1	235.0	608.9
Longview city (pt.)	67 460	29 169	115.1	44.5	114.9	44.4	587.1	1 519.4	253.9	657.0
White Oak city (pt.)	3 464	1 292	13.1	5.0	12.9	5.0	268.5	692.8	100.2	258.4
Longview Northwest division (pt.)	1 229	464	13.4	5.2	13.4	5.2	91.7	236.3	34.6	89.2
Longview city (pt.)	1 195	451	13.0	5.0	13.0	5.0	91.9	239.0	34.7	90.2
White Oak city (pt.)	34	13	5	2	5	2	68.0	170.0	26.0	65.0
<b>Harrison County (pt.)</b>	1 656	673	7.6	2.9	7.6	2.9	217.9	571.0	88.6	232.1
Holtville division (pt.)	1 656	673	7.6	2.9	7.6	2.9	217.9	571.0	88.6	232.1
Longview city (pt.)	1 656	673	7.6	2.9	7.6	2.9	217.9	571.0	88.6	232.1
<b>Lubbock, TX</b>										
The area	187 906	78 460	281.8	108.8	281.4	108.6	667.8	1 730.3	278.8	722.5
In central place	186 206	77 852	269.9	104.2	269.7	104.1	690.4	1 788.7	288.7	747.9
Lubbock city	186 206	77 852	269.9	104.2	269.7	104.1	690.4	1 788.7	288.7	747.9
Urban fringe	1 700	608	11.9	4.6	11.7	4.5	145.3	377.8	52.0	135.1
<b>Lubbock County (pt.)</b>	187 906	78 460	281.8	108.8	281.4	108.6	667.8	1 730.3	278.8	722.5
Lubbock division (pt.)	187 906	78 460	281.8	108.8	281.4	108.6	667.8	1 730.3	278.8	722.5
Lubbock city	186 206	77 852	269.9	104.2	269.7	104.1	690.4	1 788.7	288.7	747.9
<b>McAllen—Edinburg—Mission, TX</b>										
The area	263 192	91 828	322.7	124.6	322.0	124.3	817.4	2 117.4	285.2	738.8
In central place	175 480	59 492	197.8	76.4	197.4	76.2	889.0	2 302.9	301.4	780.7
Edinburg city	29 885	9 206	36.7	14.2	36.6	14.1	816.5	2 119.5	251.5	652.9
McAllen city	84 021	28 597	84.2	32.5	84.0	32.4	1 000.3	2 593.2	340.4	882.6
Mission city	28 653	10 658	36.0	13.9	36.0	13.9	795.9	2 061.4	296.1	766.8
Pharr city	32 921	11 031	40.9	15.8	40.9	15.8	804.9	2 083.6	269.7	698.2
Urban fringe	87 712	32 336	124.9	48.2	124.7	48.1	703.4	1 823.5	259.3	672.3
<b>Hidalgo County (pt.)</b>	263 192	91 828	322.7	124.6	322.0	124.3	817.4	2 117.4	285.2	738.8
Edinburg division (pt.)	36 526	11 263	52.8	20.4	52.7	20.3	693.1	1 799.3	213.7	554.8
Edinburg city	29 885	9 206	36.7	14.2	36.6	14.1	816.5	2 119.5	251.5	652.9
Lopezville CDP (pt.)	984	271	1.8	0.7	1.8	0.7	546.7	1 405.7	150.6	387.1
McAllen city (pt.)	2 694	975	8.1	3.1	8.1	3.1	332.6	869.0	120.4	314.5
McAllen-Pharr division (pt.)	144 875	49 869	157.3	60.7	157.0	60.6	922.8	2 390.7	317.4	822.9
Alamo city	8 210	3 940	7.1	2.8	7.1	2.8	1 154.3	2 932.1	554.9	1 407.1
Lopezville CDP (pt.)	1 843	469	1.0	0.4	1.0	0.4	1 843.0	4 607.5	469.0	1 172.5
McAllen city (pt.)	81 188	27 580	74.4	28.7	74.1	28.6	1 095.7	2 838.7	372.2	964.3
Mission city (pt.)	-	-	5	2	5	2	-	-	-	-
Pharr city	32 921	11 031	40.9	15.8	40.9	15.8	804.9	2 083.6	269.7	698.2
San Juan city	10 815	3 158	9.5	3.7	9.5	3.7	1 138.4	2 923.0	332.4	853.5
Mission division (pt.)	36 918	13 467	55.6	21.5	55.6	21.5	664.0	1 717.1	242.2	626.4
Abram-Perezville CDP (pt.)	852	387	3.4	1.3	3.4	1.3	250.6	655.4	113.8	297.7
La Homa CDP	1 403	369	3.3	1.3	3.3	1.3	425.2	1 079.2	111.8	283.8
McAllen city (pt.)	139	42	1.7	0.7	1.7	0.7	81.8	198.6	24.7	60.0
Mission city (pt.)	28 653	10 658	35.5	13.7	35.4	13.7	809.4	2 091.5	301.1	778.0
Polmarview city (pt.)	1 759	597	3.9	1.5	3.9	1.5	451.0	1 172.7	153.1	398.0

**EXHIBIT 2**

**LETTER FROM  
MAYOR OF WOLFFORTH**

**CITY OF WOLFFORTH**

PHONE 806/866-4215  
POST OFFICE BOX 36  
WOLFFORTH, TX. 79382

Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Amendment of Section 73.202 (b)  
Table of Allotments, FM Broadcast Stations  
(Littlefield, Wolfforth and Tahoka, Texas)  
MM Docket No. 95-83

Dear Sirs:

I am writing to express my complete support of the proposal of 21st Century Radio Ventures to bring a new FM radio station to Wolfforth, Texas. In my opinion, which I believe is shared by both Wolfforth and Lubbock residents, Wolfforth is a separate community, independent in virtually every way from Lubbock.

Our growing city of approximately 2400 residents is located outside of the city limits of Lubbock and is separated from Lubbock by agricultural land and suburban developments. We have our own elected mayor and council. We have our own city financed police department and the Wolfforth Volunteer Fire Department supplies emergency fire protection. Wolfforth EMS provides emergency medical services for our city. The City of Wolfforth provides water and sewer services.

We are very proud of our City. In the last year we have moved into a new municipal building. The building houses the municipal offices, police department, municipal court and the City Library. A new city park is near completion which includes a four-field baseball complex, basketball courts, a sand volleyball court, football and soccer areas, a lake stocked for fishing, and playground and picnic areas.

In short, Wolfforth is a great place to live, work and play. We look forward to the establishment of our first local radio station.

Sincerely,  
  
Rick McWhorter, Mayor

cc: James L. Primm, President  
21st Century Radio Ventures, Inc.

**EXHIBIT 3**  
**LOCAL ELECTED OFFICIALS**

Wolfforth Government Officials

Mayor: Rich McWhorter

Councilmen: Bob Tate  
Sylvia Preston  
Steve Jones  
L.C. Childers  
Bill Rogers

City Administrator: Frankie Pittman (appointed position)

**EXHIBIT 4**

**WOLFFORTH GTE DIRECTORY**

December

**1995-96**

**Hurlwood • Levelland • Morton • Shallowater**

**Smyer • Sundown • Whiteface**

**Whitharral • Wolfforth**

**Arnett • Lehman • Maple**

**Merrell • Pettit**

INCLUDING LOCAL YELLOW PAGES

AND AREA WIDE YELLOW PAGES

(SEE PAGE 1 OF LOCAL YELLOW PAGES FOR DETAILS)

# GTE

## *The Everything Pages®*

LOOK FOR:

- COMMUNITY ACCESS PAGES™
- LOCAL YELLOW PAGES
- AREA WIDE YELLOW PAGES
- YELLOW PAGES INDEX
- NEW COLOR COUPONS
- To Order Directories  
Call 1 800 888-8448



Area Code 806

**GTE Southwest Incorporated**



The White and/or Yellow Pages are printed on paper containing 25% minimum post consumer recycled fiber.



